Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Application by BellSouth Corporation, BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana	CC Docket No.

AFFIDAVIT WILLIAM N. STACY

William N. Stacy, being duly sworn, deposes and says:

I. PURPOSE OF THE AFFIDAVIT

1. Having provided an affidavit addressing Operations Support Systems (OSS) as part of BellSouth's application for interLATA relief in Louisiana, this affidavit responds to those OSS comments raised in opposition to that application where clarification of OSS issues is required, or where the "facts" cited by commenters are in need of correction. First, I address some general issues. Second, I address comments related to pre-ordering issues, followed by ordering and provisioning issues. Lastly, I address capacity, testing, and documentation concerns.

II. GENERAL

A. DOJ Ignores LPSC Evaluation

2. Strikingly, the DOJ inappropriately dismisses the Louisiana Public Service Commission's ("LPSC") decision on OSS. The DOJ gives basically no weight to the LPSC's investigation or conclusions. The LPSC voted to approve BellSouth's application for

interLATA service on August 20, 1997, the day after the FCC's Ameritech Order was issued, and weeks after the DOJ's Oklahoma and Michigan Evaluations were available. In its Order U-22262-A of September 5, 1997, the LPSC reported that:

> Perhaps the single most hotly contested aspect of the instant proceedings was the sufficiency of BellSouth's Operational Support Systems, LENS, EDI and TAFI. To resolve the questions raised regarding these systems the Commission conducted a technical conference, and approximately one hundred and fifteen (115) data requests relative to these systems were propounded. Following careful consideration and analysis, the Commission concludes that the Operational Support Systems do in fact work and operate to allow potential competitors full non-discriminatory access to the BellSouth system. (Page 15.)

3. Page 19 of the Louisiana DOJ Evaluation relies only upon the Florida PSC. The DOJ attempts to bolster its South Carolina position on BellSouth's OSS interfaces for CLECs by referring to the Florida Public Service Commission's Staff Recommendation of October 22, 1997, the Alabama Public Service Commission's Order of October 16, 1997, and an article from *Communications Daily* about the Georgia Public Service Commission, but ignores or dismisses the orders and recommendations of other PSCs that would undermine its position: those from South Carolina and North Carolina (and Louisiana as mentioned earlier). The DOJ's evaluation includes only a copy of the Alabama PSC's Order and relevant excepts from the Florida PSC's Staff Recommendation, which are attached as Exhibits 5 and 6 to the DOJ evaluation. However, the DOJ should have considered the opinions of all these states, not just those that support its position.

4. In concluding its section on OSS, on page 28, the NCUC Public Staff stated that:

> The Commission is satisfied that BellSouth's interfaces do not put the [CLECs] at a competitive disadvantage *vis a vis* BellSouth. All of the functionalities needed by the [CLECs] to order BellSouth's services are provided for by BellSouth through its interfaces and allow the [CLECs] to access BellSouth's OSS in substantially the same time and manner as is available for BellSouth's own personnel.

B. DOJ Ignores South Carolina OS Reply Affidavit

5. The DOJ simply attached their South Carolina OS review to their Louisiana report, seemingly ignoring my South Carolina reply affidavit, which provided evidence countering many of their positions.

6. In its evaluation of BellSouth's South Carolina application, the DOJ noted that the Alabama PSC ordered BellSouth to provide a live demonstration of its OSS for the state commissioners, its staff, and the intervenors. The DOJ does not give due recognition or respect to the similar live demonstration of BellSouth OSS interfaces for CLECs that was provided in Louisiana during the "technical conference" mentioned above. At the request of the North Carolina Utilities Commission, BellSouth also demonstrated its CLEC interfaces, as well as its own retail systems, in the hearings in North Carolina.

7. The FCC's Ameritech Order had long been available when the North Carolina Utilities Commission's ("NCUC") Public Staff issued its Proposed Order on BellSouth's application for interLATA services on October 31, 1997. Despite this proposed order's obvious relevance, the DOJ failed to consider it in its evaluation. A copy of the NCUC Public Staff's Proposed Order is attached as Exhibit WNS-1.

8. The NCUC Public Staff found, on page 24 of its recommendation, that:

> Ms. Calhoun's [BellSouth's witness for the CLEC interfaces] testimony and demonstration provides compelling evidence that BellSouth's electronic interfaces provide [CLECs] with access to BellSouth's OSS for preordering, ordering, maintenance and repair, and billing that is substantially the same as, and in many cases better than, that which BellSouth provides its own retail personnel. Intervenors argue that they do not get to use DOE or RNS as these are internal to BellSouth and are hence prejudiced. DOE, however, is an old DOS-like system which requires the operator to enter a multitude of codes and is not user friendly, whereas LENS is an easy to use, Windows-based system that is much easier to use than DOE. The Commission sees no discriminatory treatment here but only that BellSouth has simplified access for the [CLECs] to its OSS and databases. If anything, BellSouth has gone beyond the requirements set forth in Section 271(c)(2)(B) of the Act.

9. The DOJ evaluation of BellSouth's South Carolina application cited some CLECs' complaints regarding the "stability" of the interfaces. In contrast, the NCUC staff found, on pages 24-25, that BellSouth's practice of improving and changing the interfaces was a positive thing:

> The intervenors argue that these changes indicate that these interfaces do not meet the competitive checklist as they are deficient or otherwise would not need changing. The standard set forth in the Act, however, is not perfection but only that the [CLECs] must have access to the incumbent local exchange carrier's OSS in substantially the same time and manner

that an incumbent can for itself and under terms and conditions that would provide an efficient competitor with a meaningful opportunity to compete. BellSouth has testified that it has been modifying its interfaces and software where problems have arisen and/or to better meet the needs of the [CLECs]. This Commission does not view such updates as evidence that BellSouth's systems did not meet the checklist items at their inception, as argued by the intervenors, but that such changes have enhanced such interfaces and are evidence of BellSouth' s continuing objective to make its interfaces work as seamlessly as possible and meet the needs of the [CLECs].

10. The DOJ criticizes BellSouth for suggesting that CLECs can "cut and paste" information from LENS into the ordering interface or into the CLECs' OSS, and described it as "unmanageable for a CLEC seeking to enter the market on any significant scale." (See page A-13.) The NCUC Public Staff, however, after describing a CLEC's complaint about copying pre-ordering information from LENS, reported " . . . that it is very easy to electronically copy the LENS information into BellSouth's [CLEC] ordering interfaces, and it is a task that a skilled [CLEC] customer service representative can accomplish in less than a minute." (Page 22.)

11. In addition, BellSouth has developed a machine-to-machine version of the LENS interface, a Common Gateway Interface (CGI). This interface, including all of the LENS functionality, has been available since April 1997.

12. 12. Instead of relying on the Georgia PSC's actual Interim Order Regarding Revised Statement in Docket No. 7253-U (released on October 30, 1997) for its understanding of

the Georgia PSC's position on BellSouth's OSS interfaces, the DOJ instead relies on an October 30, 1997 article in *Communications Daily*. The actual Interim Order makes clear, however, that the purpose of the Georgia PSC in issuing the Interim Order was to determine the status of BellSouth's Revised SGAT, not to reach " . . . any conclusion as to whether BellSouth or its Revised SGAT would meet the checklist requirements of Section 271" (page 11).

13. In order to propose any necessary enhancements and to ensure that BellSouth's OSS systems meet the spirit and intent of the Act, the Georgia PSC scheduled a non-adversarial "technical workshop" as described in the Interim Order. The workshop was conducted on December 9 and 10, 1997. The Interim Order shows that the Georgia PSC's position is by no means as definite or negative as the *Communications Daily* article would suggest.

14. In asserting that BellSouth does not provide CLECs with the same OSS that BellSouth uses for its retail operations, ALTS complains that, "BellSouth refuses to allow CLECs to use either its legacy OSS - claiming harm to customer privacy - nor will it create any mediated access that would cure such 'difficulties'." ALTS is not correct. For repair and maintenance, for example, CLECs and BellSouth both use the Trouble Analysis Facilitation Interface (TAFI). TAFI, in turn, accesses the same downstream, internal maintenance "legacy" OSS that BellSouth uses in its retail operations; these OSS are also used for CLEC maintenance records processing. such as providing maintenance histories. These systems process both CLEC and BellSouth troubles the same way, and in the order in which they are received via TAFI. (Also see original William Stacy OS Affidavit.)

15. The ALTS comments are just as misplaced with respect to ordering and provisioning. First, no CLEC has requested direct access to BellSouth's retail ordering and provisioning systems, such as the RNS, DOE and SONGS systems described in my initial affidavit. On the contrary, while BellSouth uses different systems for residence and business orders, and for different sectors of its nine-state region, CLECs have requested industry standard ordering and provisioning interfaces, such as the EDI interface BellSouth makes available for CLECs. To accommodate the CLECs' preference, the systems on BellSouth's side of the EDI interface convert industry standard CLEC local service requests to service order formats recognized by the same legacy Service Order Control System (SOCS) that processes retail orders, which is a form of mediated access. Finally, it should be noted that in its Oklahoma filing, SBC indicated that it offers CLECs direct access to its retail ordering systems. The DOJ, however, in its Oklahoma evaluation, took a negative view of that arrangement, stating "as both a practical and legal matter, SBC's ability to receive orders . . . rests exclusively on its EDI interface." (See Oklahoma Evaluation, page 79)

III. PRE-ORDERING

16. The DOJ's South Carolina analysis with regard to pre-ordering functionality is rendered faulty by an unfortunate misapprehension of key facts. Furthermore, even if the conclusions were valid, they would be irrelevant to the overwhelming majority of CLEC orders, and thus would have no practical bearing on a CLEC's opportunity to compete.

17. The DOJ focuses its pre-ordering functionality inquiry primarily on the availability of telephone numbers and installation dates. What the DOJ first fails to recognize is that neither function is relevant to BellSouth's existing installed base of customers -- the

primary target market for CLECs. This fact is corroborated by an October 9, 1997 AT&T filing with the FCC in which AT&T indicates that the "overwhelming majority" of CLEC orders involve the migration of existing customers' accounts -- either as is, or with a feature change. (See AT&T's Opposition to Petitions for Reconsideration and Clarification in CC Docket No. 97-137.) Quite simply, existing customers already have telephone numbers and installed service. There is no need to assign or reserve telephone numbers nor to determine an "installation" date. Thus, while the DOJ suggests that BellSouth's limit on the speculative pre-reserving of telephone numbers in the absence of actual customer orders "may deprive CLECs a meaningful opportunity to compete," this limit has no bearing on the overwhelming majority of CLEC orders.

18. Moreover, and most importantly, the DOJ is mistaken in believing that the 100 number reservation limit for each central office affects order activity even for those orders that require number assignments. Reservation is defined as holding a number for future use without an imminent request for service. This limit was designed to address a simple mathematical fact: if ten CLECs were to reserve 1,000 numbers in each central office for speculative future use, an entire NXX code would be exhausted in every central office without any actual customer orders for service. As explained in the following paragraphs, AT&T is not limited to the use of only 100 numbers per central office at any given time.

19. The potential for CLECs prematurely to exhaust through advance reservations already scarce telephone numbers in the absence of customer orders, coupled with the facts that telephone number assignment is not even a relevant function for most CLEC orders, and that no limits are applied to numbers selected for actual service orders, makes BellSouth's current process reasonable. This process has no demonstrable bearing on a CLEC's

telemarketing campaigns (of course, potential customers who receive solicitations already have telephone numbers), or any other aspects of a CLEC's meaningful opportunity to compete.

20. While AT&T has complained vociferously to this Commission as well as to state commissions about limits on number reservations, the 100-number policy in fact was negotiated between AT&T and BellSouth and is included in BellSouth's interconnection agreement with AT&T. It is clear from the language in that agreement that AT&T is not limited to the use of only 100 numbers per central office at any given time. This language also appears in several other CLECs' interconnection agreements. Paragraph 28.1.1.4 of the General Terms and Conditions, Part One of that interconnection agreement for every state in the BellSouth region, including Louisiana, contains the following language:

> BellSouth will reserve up to 100 telephone numbers per NPA-NXX at AT&T's request, for AT&T's sole use. **BellSouth will provide additional numbers at AT&T's request in order that AT&T have sufficient numbers available to meet expected needs.** The telephone number reservations made in this manner are valid for AT&T's assignment for ninety (90) days from the reservation date. BellSouth will make the telephone number reservations available to AT&T via diskette by no later than August 15, 1996 and by electronic file transfer no later October 15, 1996. BellSouth agrees to implement an electronic interface to improve this process by December 31, 1996, but no later than April 1, 1997. **(Emphasis added.)**

21. The electronic interface described in the last sentence of the previous paragraph is the LENS interface. Numbers are reserved through the inquiry mode of LENS, while the "additional numbers" to which BellSouth contractually committed are available through the firm order mode of LENS. As the highlighted information shows, there is no limitation that would make it infeasible for a CLEC to obtain numbers and place orders in competitively significant numbers, or that would inhibit targeted marketing campaigns, as the DOJ suggests. The limit on reservations is simply a negotiated starting point that recognizes the finite nature of the available supply of telephone numbers. In fact, BellSouth is removing the 100 number limit for numbers reserved through the inquiry mode of LENS as of January 1998.

22. Of course, even today, for those orders actually involving telephone numbers, a CLEC can avoid the telephone number "reservation" process and its associated limit altogether by simply "selecting" a telephone number from among those generally available using the firm order mode of LENS. This can be done regardless of whether the actual order will be placed via EDI, LENS, or any other means.

23. This capability highlights another error of the DOJ. The Department appears to misunderstand that pre-ordering information can be obtained in either the inquiry mode or the firm order mode of LENS. For example, at page A-17 of Appendix A, the DOJ indicates that because BellSouth does not recommend the use of LENS for ordering, "inquiry mode can be expected to be the typical mode." In fact, however, LENS contains pre-ordering information in both modes, and the CLEC can select telephone numbers in the inquiry mode, even if the order will subsequently be placed via EDI. Numbers remain "selected" for ninety days using firm order mode.

24. MCI also expresses concern that while using LENS, CLECs may only select a limited number of phone numbers in a single session. Again, this is not relevant to existing customers. For new customers, CLECs can select six numbers at a time, and they may do so twice, yielding a twelve numbers selection capability in a single session. Given that the average number of lines per retail order for new service is less than two, as well as the fact that number selection is not even needed for the vast majority of CLEC orders, this does not limit a CLEC's meaningful opportunity to compete.

25. The fact that pre-ordering information can be obtained in either the inquiry or the firm order mode, at the CLEC's option, also obviates another concern of the DOJ and AT&T, regarding address validation in the inquiry mode of LENS. The "mechanism" that saves the validated address from one pre-ordering function to the next, which the DOJ asserts is necessary to offer functionality like BellSouth's own systems, already exists in the process of obtaining pre-ordering information in the firm order mode. The inquiry mode, meanwhile, offers CLECs the option of going directly to a specific pre-ordering function, rather than following the pre-determined sequence.

26. Furthermore, even in the inquiry mode of LENS, address validation is not a required function at all for obtaining customer service records (CSRs). Obtaining a CSR is the pre-ordering function CLECs are most likely to use, given that -- as AT&T admits -- most CLEC orders involve existing customers switching local providers. For those requests, the CLEC will consult the existing customer record, which already contains a validated address. Thus, this issue is irrelevant to the overwhelming majority of CLEC orders. Finally, even if the CLEC chooses not to use the firm order mode and seeks

service for a new customer, address validations take only a few seconds, and repeating them does not impede CLECs' ability to compete.

27. In footnote 28 on page A-20 of its Evaluation, the DOJ refers to the complaint that the LENS preordering interface does not show driving instructions for unnumbered addresses during address validation. On the one hand, the DOJ does "not believe that the Commission should require 'perfection' in OSS offerings as a condition of section 271 approval," but on the other hand, the DOJ implies that because LENS does not display "driving instructions," CLECs may lack parity. (DOJ Evaluation at page 28.) What the DOJ overlooks, however, is that this is a nearly obsolete functionality for BellSouth's retail operations, as explained in ¶ 18 of my initial OSS affidavit. (CLECs do not need these driving instructions for repair & maintenance purposes. CLECs do not have to go to the customer's premises in either case.) Even if this information were useful for address validation, it would not be relevant to CLECs' orders to switch the installed base of customers to the CLEC.

28. As with its review of access to telephone numbers, the Department's discussion of access to installation dates using the DSAP installation calendar misses the mark. The DOJ once more fails to recognize that this function is not applicable to most CLEC orders, given that most CLEC orders will be to switch existing customers. For example, the DOJ mistakenly concludes, at page A-17 of Appendix A, that "for the 80 percent of orders that BellSouth estimates will be submitted via EDI, not only will the CLECs be unable to provide their customers with firm due dates on the original telephone call, they will often be unable to provide due dates the same day." This conclusion presumes that all the CLEC orders will be for new service requiring premises visits, which is simply not

consistent with the facts. As AT&T correctly indicates in its October 9, 1997 filing in CC Docket No. 97-137, the overwhelming majority of CLEC orders involve a switch "as is" or switch "with changes," such as PIC or feature changes; these orders do not involve "installations" requiring premises visits. Thus, the DSAP installation calendar, which provides schedule availability for new installations requiring premises visits by field installation forces, has no bearing on these orders and need not be consulted at all for the vast majority of CLEC orders. These orders instead involve business rules that have been provided to CLECs through an industry letter and were included in Exhibit WNS-49 of my original OSS affidavit. For example, switch as is orders received by 3:00 p.m. carry a same-day due date; such orders received after 3:00 p.m. carry a next-day due date. Thus, contrary to the Department's conclusion that BellSouth denies CLECs non-discriminatory access to installation dates, the CLECs can, in fact, provide their customers with firm due dates on the original telephone call.

29. The DOJ claims that LENS does not calculate a due date. In fact, LENS **does calculate a due date as part of a firm order,** just like BellSouth's retail systems actually calculate a due date. The installation calendar tables used to calculate the due date are shown in the LENS inquiry mode as well;BellSouth's retail service representatives also access the installation calendar separately to respond to retail customer inquiries. Other information affecting the due date is visible in both the inquiry and firm order modes, as the inquiry mode installation calendar shows both the Quickservice and Connect Through indicators.

30. The DOJ states that "BellSouth has not justified its lack of a pre-ordering application-to-application interface." (Appendix A, page A-12.) We disagree. In the absence of industry standards, BellSouth will willingly engage in joint development of an

application-to-application interface with any carrier that is willing to undertake its share of the development. AT&T has made a specific request for an application-to-application pre-ordering interface, and BellSouth is developing an interface designed to AT&T's specifications. While the DOJ correctly notes that the interface, known as EC-Lite, will be available late December, 1997, what the DOJ overlooks is that the EC-Lite timetable was negotiated between the parties and is specified in the BellSouth-AT&T interconnection agreement. That mutually agreed upon timetable reflects the development effort required by AT&T as well as BellSouth. Simply stated, AT&T itself is not ready to use EC-Lite.

31. Second, the DOJ recognizes that application-to-application interfaces are very expensive, and not suitable for all CLECs. Experience in the interexchange access environment supports this view, as only the largest interexchange carriers have implemented the application-to-application interfaces available for access. Moreover, for OSS access, AT&T has chosen a customized application-to-application pre-ordering interface developed in advance of industry standards, while BellSouth's interconnection agreement with MCI (for example) contemplates an industry standard interface, when such standards become available. Given that there is no industry standard for such an interface, together with the significant cost of application-to-application interfaces -- for which BellSouth is entitled to seek recovery from CLECs -- it makes little sense for BellSouth unilaterally to develop an expensive additional unbundled element in the form of an interface for which there has been no demand outside the hearing room.

32. The DOJ suggests, in footnote 8 of Appendix A, that industry standards development is often stable early in the process, with the implication that BellSouth should be able to

proceed with development in anticipation of eventual standards. BellSouth did, in fact, develop its EDI ordering interface on that basis beginning in April, 1996 -- and has been vehemently criticized by AT&T in state proceedings for the "instability" of its interface and accompanying documentation when subsequent changes were necessitated to conform to the final industry standards.

33. As to pre-ordering standards, while the DOJ recognizes that there currently is no pre-ordering standard, Appendix A at page A-6 states without explanation that "[t]he Department understands that standards for pre-ordering functions are also expected soon." However, the industry's direction is not at all clear. The recent activity at the industry's Electronic Communications Implementation Committee (ECIC) is particularly illustrative of this point. In April, 1997, ECIC reported to the industry that it had evaluated a number of alternatives for an application-to-application pre-ordering interface, and recommended that the industry adopt EDI as the "least objectionable" alternative. However, ECIC continued to discuss the issue, and as recently as October 30, 1997, produced an alternate, temporary dual "standards" recommendation of both CORBA and EDI/SSL3, with the anticipation of CORBA becoming the long-term recommendation. (MCI's preference of EDI TCP/IP was rejected by ECIC, which is why BellSouth has not agreed to build an EDI pre-ordering interface based on TCP/IP, absent an agreement to reimburse the cost of such development. The MCI interconnection agreement requires industry standard interfaces.) The ECIC activity makes it quite clear that an application-to-application interface is not by definition a single, standardized interface. Therefore, an application-to-application interface alone, in the absence of an industry standard, means that much of the benefit of an application-to-application

interface cited by the DOJ -- such as a single system that CLECs can use to interact with all BOCs -- is illusory.

34. As the DOJ correctly notes, BellSouth has contractually obligated itself to implement industry standards when they become available, and has undertaken AT&T-requested development of an application-to-application interface on a negotiated schedule that reflects AT&T's timetable as well as BellSouth's. No further justification of BellSouth's position on application-to-application interfaces is necessary.

35. BellSouth is encouraged by the DOJ's apparent agreement that CLECs are responsible for integrating the pre-ordering and ordering functions (Appendix A, page A-14). It is unfortunate, however, that the Department has chosen to rely on the unsupported allegations of commenters such as AT&T in erroneously concluding that BellSouth is at fault for not having "systems that are necessary to accomplish this task that have [been] fully specified, implemented, and tested." (Appendix A at A-14) For example, in footnote 16 of Appendix A, the DOJ recites without question AT&T's statement that "BellSouth has never provided final, usable specifications."

36. The DOJ relies on AT&T's account of the issues around these specifications, yet AT&T's account omits important facts. In ¶¶ 32-45 of his affidavit, to which the DOJ refers, AT&T's Mr. Bradbury accuses BellSouth of not cooperating with AT&T on the Common Gateway Interface [CGI], or tag-value, process that would allow AT&T to integrate LENS data with AT&T's OSS. .In fact, over a number of months, BellSouth attempted to accommodate AT&T's desire for an application-to-application interface. In addition to the development of the EC-Lite interface, BellSouth made several proposals to AT&T regarding methods for integrating AT&T's OSS with LENS. When AT&T began

requesting the CGI specification in 1996, BellSouth told AT&T that it would not be available until the LENS pre-ordering interface was complete, which occurred on April 28, 1997. Again in March, 1997, BellSouth told AT&T that the CGI specification in question was not ready to be released, and would be available at the end of April. At AT&T's insistence, the specification was released to AT&T for review on March 20, 1997, before the BellSouth technical developers considered it complete. AT&T was aware of this on April 8, 1997, when BellSouth retracted the CGI document for technical reasons.

37. What AT&T further omits from its account is that AT&T decided to discontinue work on the proposed CGI development because it would require more development effort on AT&T's part than AT&T was willing to undertake. In a May 5, 1997 letter from an AT&T vice president to BellSouth's Interconnection Services President, AT&T stated that it had found the tag-value solution (i.e., CGI) to be an "attractive alternative" that would "provide the query responses in a format that could be useful to AT&T in eliminating manual rework." However, the same letter, which is provided as Exhibit WNS-2, indicated that AT&T was rejecting this alternative because, upon examining the April, 1997 draft documentation, AT&T had "discovered" that it would have to play a significant role in the development that had not been evident in the draft AT&T had insisted upon receiving before BellSouth's developers had finished their work. While BellSouth therefore does not dispute that it suspended work on the CGI specifications in April, 1997, it did so because AT&T specifically informed BellSouth that AT&T had no further interest in pursuing that alternative, and there was no interest expressed by any other CLEC at that time.

38. Moreover, the DOJ appears to have misunderstood AT&T's convoluted account, as the DOJ inaccurately reports, in footnote 16 of Appendix A, that "BellSouth witnesses . . . have testified before state commissions that firm specifications require a LENS interface that will not exist until at least 1998." No such testimony has been given in any state in the BellSouth region and the 1998 date is false: LENS has been operational since April 1997, so the CGI specifications can be finalized with interested CLECs.

39. The DOJ further reports, at page A-26, that while BellSouth represents that CGI specifications are available, AT&T's Bradbury affidavit "cit[es] contrary BellSouth testimony before state public service commissions." BellSouth's witness on these issues in the state proceedings actually testified that the specifications provide a good basis for beginning discussions with an interested CLEC about the joint development required, and that some updates must be and have been made to reflect the current LENS functionality, but that joint discussions and development could begin with the information currently available while the specification was updated as a parallel effort. Actual sworn testimony on this point was included in Attachment 5 of the MCI King declaration in this proceeding. See page 3461, lines 19-23 of the transcript from the Georgia PSC Docket No. 6863-U, and page 1337, lines 7-21 of the transcript from the Florida PSC Docket No. 960786-TL, both provided here as Exhibit WNS-3.

40. As the result of more recently receiving indications that MCI was prepared to develop jointly the CGI interface, BellSouth has agreed to update the previously drafted CGI specification, from which MCI could have started coding, in cooperation with MCI. The updated CGI specification was given to MCI on December 15, 1997. While the MCI King affidavit makes various claims about MCI's interest in CGI, it was not until MCI's

letter of September 5, 1997 (Attachment 6 to the affidavit of King of MCI), that MCI indicated that it was ready to proceed with a joint development effort, which provided a reasonable basis for BellSouth's committing additional resources to this effort.

41. MCI alleges that a CLEC cannot determine if service was ever provided at a specific address in LENS. That is not correct. LENS shows a message from RSAG which indicates if no service was previously provided at an address.

42. MCI complains that a CLEC using LENS must scroll through a list of codes for presubscribed interexchange carriers (PICs) and features to determine if the customer's desired PIC or feature is available. Interexchange carriers are listed randomly in LENS, just as they are for BellSouth's retail service representatives due to a divestiture-related regulatory requirement. A BellSouth service representative using DOE would scroll through the same list of carriers as the CLEC. In point of fact, however, neither LENS nor DOE users need actually scroll for most orders, because most of the interexchange market is controlled by a very few carriers (including MCI itself) with PIC codes that are well-known to service representatives. Features are listed alphabetically in LENS for ease of use.

43. MCI alleges that a CLEC using LENS cannot determine what (customer) local taxes might be applicable. A carrier's local tax status is a required field, and applies to the carrier, not to the end customer. BellSouth has no way of knowing what a CLEC's tax status, which varies among CLECs, is, which is why it is a required input. A customer's tax status is available from the customer, and is not part of the definition of pre-ordering information.

44. MCI claims that BellSouth failed to provide access to "important pre-ordering functions, such as block of direct inward dialing (DID) number inquiry, DID trunk inquiry, and unbundled network element service provider inquiry." DID numbers and trunks are contained in ATLAS, which LENS accesses. Large blocks of DID numbers are handled manually for both CLECs and retail. DID trunks are orderable via EDI. Industry-wide, these functions are being addressed by OBF more as ordering functions. If MCI wants BellSouth to develop access to these functions, it can submit this request via the BFR (Bona Fide Request) process. If and when pre-ordering DID standards are complete, BellSouth will add them to LENS.

45. Several CLECs have complained that LENS does not provide them with the ability to view and/or print longer customer service records (CSRs). The situation was explained in my initial affidavit at ¶ 38. The 54-page limit, as described in that affidavit, is actually a 54-page limit per simple CSRs, and per section limit for complex records (e.g., PBX and Centrex-type customers), and CLECs can print and view seven sections for complex CSRs, for a "limit" of 378 pages. Also, equipment rates are not shown on CSRs because rates packaging is BellSouth proprietary, marketing information.

46. AT&T claimed that on September 19, 1997, approximately half of 60 AT&T representatives experienced many time-out errors when they were doing address validations and telephone number transactions. BellSouth received no AT&T trouble tickets on September 19, 1997.

47. Recently, a software problem caused BellSouth to restart LENS periodically. A fix for that software problem was implemented on December 12, 1997. However, at no time did

it affect any CLEC's ability to compete, because LENS was down for only a few seconds at a time.

48. KMC claimed that it takes ten minutes to dial into LENS. That is incorrect. LENS dial-up access takes less than one minute to at most two minutes, depending on the speed of the modem in use.

49. AT&T incorrectly claims that RSAG, the address validation database, collapsed in response to modest increases in volumes of simple POTS orders. The problems cited by AT&T did not occur with any of the interfaces on which BellSouth is relying for non-discriminatory access, but arose in an interim tool for address validation called *Interconnection Reference External Customer Validation* (ICREF), which was originally developed for the interexchange carrier market. AT&T was using this application because they had not yet completed their internal training program on LENS. The primary cause of this "problem" was that multiple AT&T agents were improperly using the same passwords to access the system, rather than individually-assigned passwords, as AT&T had failed to request from BellSouth an appropriate number of passwords. What AT&T depicts as a "capacity" problem was, in fact, the system's properly interpreting this AT&T practice as a potential security violation and taking appropriate steps to restrict access.

50. BellSouth twice sent an engineer to the AT&T center to evaluate how ICREF was being used and to observe the error conditions being reported. When the actual number of users became known, BellSouth immediately, on its initiative, doubled the physical capacity of the interface to accommodate the unforeseeable volume. BellSouth also revised the system parameters to reflect the actual number of AT&T agents using the system. AT&T

employees were also inputting NPA/NNX combinations that were not found in BellSouth's region, which produced unusual error messages that AT&T erroneously interpreted and reported to BellSouth as "RSAG problems". During this period, BellSouth developed and implemented additional edits on NPA and changed the error message to better describe the condition. Throughout this process, AT&T did not follow the established, agreed-upon problem reporting process and consequently reported the problem erroneously as an "RSAG problem". Once the proper problem area was identified, BellSouth quickly assembled a team that took the steps described above. After this work was completed, BellSouth formally requested that AT&T again apply high volume usage to the ICREF system to demonstrate our ability to handle the demand. As of October 22, 1997, AT&T has failed to respond to the request.

51. Although real-time access to RSAG has been provided through LENS and is being tested through the EC-Lite interface, MCI has requested downloads of the RSAG database as an alternate method of accessing RSAG information. The software development effort required to provide a daily download of the RSAG data has been scoped (analyzed, sized and costed), and BellSouth sent a letter to MCI indicating the charges for the downloads and daily updates of the RSAG data.

IV. ORDERING AND PROVISIONING

52. The DOJ, AT&T, and MCI complain about rejects and jeopardies being returned manually. Edits - indications of obvious data errors or omissions - to minimize these rejections have been available via the LENS ordering functionality since its availability in April, 1997. Moreover, CLECs are not entirely correct when they claim that rejected orders are handled manually. EDI orders rejected by the EDI translator are rejected

electronically, and customer-caused missed appointments, which are a form of jeopardy notification, are returned electronically. Orders rejected by subsequent systems are handled manually. BellSouth made the initial version of an automated capability for these subsequent rejections available in November, 1997, and is testing this version with MCI, even though AT&T indicated that it was not ready to handle electronic rejects in November. This November automated rejects capabilty provides 68% of the mechanized rejects being developed by BellSouth. BellSouth's criteria for rejects are based on OBF rules and conditions insofar as they exist, and on BellSouth's internal systems' requirements for data fields. The full automated rejects capability is scheduled to be operational in the first quarter of 1998, sincethe CLECs using EDI agreed on the specifications. Such agreement is necessary because several CLECs are using or implementing EDI, and there is no industry standard for this capability. To facilitate the process of obtaining such agreement, all CLECs using EDI were invited to a CLEC conference hosted by BellSouth on October 30 and 31, 1997, at which this issue was discussed and agreement to proceed was reached

53. BellSouth service representatives in the Local Carrier Service Center (LCSC) process rejected orders requiring manual handling. Such manual handling for CLECs' orders is comparable to that for BellSouth's own orders that are rejected. BellSouth has a retail center for rejected residence orders known as the Trouble Resolution Error Correction Center (TRECC). Manual error correction is performed by services representatives at the TRECC, just as CLEC orders are corrected in the LCSC.

54. The DOJ indicates BellSouth's CLEC flow-through rate is low, quoting AT&T's claim of BellSouth's flow-through, but not BellSouth's indicated flow-through figures, which

were 91% adjusted flow-through for August (see Exhibit WNS-38) and 89% for September. These figures compare favorably to the range of BellSouth's retail flow-through rates of 96% for residence and 81% for business. The reason the CLECs' errors are removed to show the adjusted flow through rate is to show the actual capability of BellSouth's systems - as opposed to CLECs' ordering accuracy. Some CLECs are capable of high flow-through, as shown in Exhibit WNS-41. BellSouth continues to work with CLECs to increase flow-through and decrease CLECs' errors, including keeping the systems' documentation current (see Documentation & Training section below). Indeed, the Commission may be interested that flow-through improvements have yielded a non-adjusted flow-through rate for September and November of 39% and 45% respectively, with an adjusted flow-through rate discounting CLEC errors of 67% and 91% respectively.

55. The DOJ, in relying on the affidavit of AT&T's witness, Jay Bradbury, and in its review of Exhibit WNS-52, apparently has misunderstood -- and therefore understated -- the quantity and types of resale services and unbundled network elements that are available through the EDI interface. As described in my OSS affidavit at ¶¶ 53, 60, and 67, EDI supports the electronic ordering of 30 resale services, four "complex" resale services (PBX trunks, Synchronet®, ISDN-Basic-Rate services, and hunting), and unbundled loops, unbundled ports, and interim number portability.

56. Furthermore, the information in ¶ 67 of my OSS affidavit shows that BellSouth offers to CLECs electronic ordering with mechanized order generation ("flow through") for BellSouth's most often requested retail services. As of the date BellSouth filed its application for interLATA service in Louisiana, mechanized order generation was